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June 5, 1984
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Office of Nuclear Reactor Regulations
Attn: John F. Stolz, Chief
Operating Reactors Branch No. 4
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Stolz:

Three Mile Island Nuclear Station, Unit I (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Supplement to Technical Specification Change Request No. 116, Rev. 1

The attached Technical Specification should replace specifications 3.6.9 and 3.6.10 as submitted in Technical Specification Change request 116, Rev. 1, November 24, 1983, (TSCR 116).

The proposed change to Technical Specification 3.6.9 lists safety related reasons for which containment purging is permitted. A sample of past RWP's for containment entry shows that approximately 65% of entries were for safety related non-routine corrective maintenance, the majority of which were I & C related (i.e.: level and flow transmitters). It is the goal of management to minimize repetitive safety related maintenance as acknowledged in the TMI-1 Restart Hearings. Emergency surveillance entries will be necessary to identify the nature of, and to support, any safety related corrective maintenance.

Technical Specification required routine surveillances and engineering support entries shall be scheduled to coincide as practical, in order to reduce instances of containment purging. As a goal toward minimizing purge time it is expected that routine surveillance will require approximately 32 hours per month of containment purging. This includes approximately 8 hours of pre-entry purge time per entry. Additionally, in response to IE Bulletin 80-24 GPU has established a procedure for weekly containment entry in order to perform a visual sump surveillance. This will add three entries per month as well as prolonging Tech Spec. surveillance entries. Radiation surveys necessary for RWP and ALARA considerations should add no more than an additional four hours purge time for each containment entry. It is our goal to minimize the number of planned outages to no more than twice per year with pre-shutdown purging not to exceed 24 hour duration.

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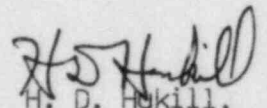
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The need for purging is based on ALARA considerations which take into account overall airborne isotope and noble gas concentration, job specific exposure rate, length of job and RWP restrictions. With the purge valves limited to approximately 30° open the accompanying reduction in flow necessitates longer purge time. Our estimated goal of containment purge time to accomplish the activities necessary for the safe operation and maintenance of the plant, as outlined in proposed Tech Spec 3.6.9, is approximately 100 hours per month.

This proposed specification outlines prudent safety related reasons for containment purging and is far more conservative than that proposed in TSCR 116 Rev. 1 which would have allowed unlimited, undefined purging. This change has no adverse impact on the previous safety evaluation for TSCR 116 Rev. 1.

In addition, Technical Specification 4.4.1.2.5.d and 4.4.1.6.1 should be revised to delete the phrases "when purging is permitted (TS 3.6)" and "once per refueling or...if reactor building purging is permitted per TS 3.6" respectively,(see attached). This will make specification 4.4.1.6.1 consistent with 10 CFR 50 Appendix J and does not change the spec as currently stated in the TMI-1 Technical Specifications. These phrases were added in TSCR 116 Rev. 1 with the assumption of continuous purging restricted only by purge valve inoperability. Containment purging will now be permitted for safety related reasons only, as outlined in the attached specification 3.6.9. Removal of these phrases makes the specifications effective at all times which is a more conservative approach.

Sincerely,


H. D. Hukill,
Director, TMI-1

HDH/RAS/mle

Enclosure

cc: J. Van Vliet
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T. Gerusky
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